

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

BRIGHTON TRUSTEES, LLC,
AS TRUSTEE, *et al.*,
Plaintiffs,

v.

GENWORTH LIFE AND ANNUITY
INSURANCE COMPANY,
Defendant.

Civil No. 3:20cv240 (DJN)

**CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES, REIMBURSEMENT OF
LITIGATION EXPENSES, AND INCENTIVE AWARDS**

Pursuant to the Court’s Order Preliminarily Approving Class Action Settlement (ECF No. 136 ¶ 20), Class Counsel for Plaintiffs Brighton Trustees, LLC, on behalf of and as trustee for Diamond LS Trust; Bank of Utah, solely as securities intermediary for Diamond LS Trust; and Ronald L. Daubenmier (together, “Plaintiffs”), on behalf of themselves and the certified class, move this Court before the Honorable David J. Novak for an order for attorneys’ fees, reimbursement of litigation expenses, and incentive awards for Plaintiffs.

In support of this motion, Class Counsel will rely upon the accompanying memorandum of law, the declarations attached hereto, and other written or oral argument as may be requested or permitted by the Court.

Dated: July 8, 2022

Respectfully submitted,

/s/ Kathleen J.L. Holmes

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